

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

PARENTS DEFENDING
EDUCATION,

Plaintiff,

v.

OLENTANGY LOCAL SCHOOL
DISTRICT BOARD OF EDUCATION,
et al.,

Defendants.

Case No. 2:23-cv-01595

DECLARATION OF PARENT C

1. I live within the boundaries of the Olentangy Local School District (“Olentangy”) and am the parent of a school-aged child.

2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.

3. I am a member of Parents Defending Education.

4. I have multiple children that attend District schools, including middle and elementary schools. All my children will attend a District school next year.

5. I believe that people are either male or female and that the recent increase of adolescents identifying as transgender or “non-binary” is a product of social contagion and other underlying societal factors. I believe that most children who express a transgender or non-binary identity are confused or struggling with other difficulties in their lives. I also believe that most children who experience feelings of gender dysphoria grow out of that stage after

finishing puberty. I believe that issues of gender are sensitive issues that should be left to families to discuss and resolve—not to schools.

6. I have raised my children to believe that people are either male or female, that biological sex is immutable, and that sex does not change based on someone's internal feelings. I have raised my children to be kind, but I have also taught them that kindness does not require them to state things that they know to be false. Likewise, I have taught them to tell the truth and always stand up for their beliefs, even when those beliefs are unpopular.

7. My children believe that people are either male or female, that a boy cannot become a girl, or vice versa, and that a person cannot be “nonbinary” (*i.e.*, neither male nor female). They do not have animosity toward children or adults who identify as transgender or nonbinary. Still, they do not want to be forced to “affirm” that a biologically female classmate is actually a male, or vice versa; nor do they want to “affirm” that a classmate is nonbinary. Doing so would conflict with our family's deeply held beliefs, including the beliefs that I have passed on to my children, as well as their own beliefs and notions of common sense.

8. Each of my children know and interact with students that identify as transgender or nonbinary at school. For example, my child in elementary school comes into contact with a biological male student who identifies as female during the school day, including in the girl's bathroom.

9. When issues involving gender identity arise in class or in school-sponsored activities, my children want to repeatedly state their belief that biological sex is unchangeable, among other beliefs about sex and gender. In addition, they wish to use pronouns that are consistent with a classmate's biological sex, rather than the classmate's “preferred pronouns.”

They believe that using pronouns that describe a biological female as a male is participating in a lie. They also wish to share their discomfort about using a restroom with people of the other biological sex. They refrain from doing so, however, because they fear that expressing their beliefs that sex is immutable—or similar views—will cause them to violate District policies.

10. For example, my children refrain from using pronouns that match classmates' biological sex if they know that the classmate has a different "preferred" pronoun. They also refrain from stating their beliefs about sex and gender and from expressing their concerns about sharing bathrooms with students of the opposite sex. My children often remain silent in classroom environments, but when they do participate in class, they feel that they must tell their teachers what they want to hear.

11. My children's fear of speaking openly is informed by years of personal experience with the District and its officials.

12. For example, one of my children received a "Culture Quest Challenge" directing them to "answer the following questions": "How can you show acceptance/be respectful toward trans people?" "What are ways that you can support a trans person? (list at least 2)" "What is one thing you should challenge specifically about trans people to make the community safer for them?" The post then emphasized that there will be "a 6th Grade, 7th Grade, AND 8th Grade winner for each Culture Quest Challenge" with "[p]rizes."

13. I am also aware that, according to the District, "[a] student purposefully referring to another student by using gendered language they know is contrary to the other student's identity would be an example of discrimination under Board Policy."

14. I want my children to be educated in a challenging environment that involves the free exchange of ideas and to be free to express their beliefs, even if others disagree with them or find them offensive. I do not want my children to be forced to affirm beliefs about gender identity that conflict with their deeply held convictions.

15. Under the District's school policies, however, my children can be punished merely for declining to use another student's "preferred pronouns" or for expressing discomfort about sharing bathrooms with teachers or students of the opposite biological sex.

16. I am concerned that my children will be subjected to formal discipline unless they affirm ideas that are inconsistent with their deeply held beliefs. Such discipline for speech consistent with their own deeply held convictions is detrimental to their current school experience.

17. I also worry that being disciplined for stating their fundamental beliefs will inflict mental and psychological harm on my children by forcing them to "choose" between expressing the beliefs they have been taught at home and following the instructions of teachers and other District authority figures. This is no way to live in a free society.

18. Further, I know that the process of repeatedly being subjected to discipline for stating their beliefs will expose my children to reputational harm and personal attacks from other students and members of the Olentangy community.

19. My children have repeatedly told me that they want to go to school in an environment that allows them to express their views. I have watched my children steadily lose self-esteem and self-confidence over the course of the 2022-2023 school year because of the District's policies.

20. My constant anxiety that my children will be subjected to this harm has caused me emotional and psychological harm. For example, it has caused me to question whether to instruct my children to follow their conscience or to remain silent and affirm viewpoints contrary to their convictions in order to preserve their opportunities for college, among other things. It has also caused me to question whether I am subjecting my children to these harms from the District's policies by not withdrawing them from Olentangy, even though our family cannot afford the financial strain that would impose.

21. I am signing this declaration under a pseudonym because I live in Olentangy and, if my participation in this litigation becomes public, I fear reprisal from school officials, my children's teachers and fellow students, and members of the broader community. I also want to protect the identity and privacy of my children concerning these deeply sensitive issues.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 30th day of April, 2023

Parent C
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